

TECHNICAL MEMORANDUM

DATE: July 22, 2009
TO: Renton Planning Commission,
FROM: David Sherrard, Parametrix
SUBJECT: Renton Shoreline Master Program
DRAFT Shoreline Master Program 07-22-09 Code Overview

This Technical Memorandum provides a general overview of the Parametrix Draft Code dated July 22, 2009 to be considered by the Planning Commission at the July 29 and subsequent meetings.

The following documents have been transmitted at this time:

- This Overview Memo
- Draft Shoreline Management Program dated 07-22-09

Prior to the meeting on July 29 we also will transmit:

- Revised Inventory and Characterization
- Preliminary Cumulative Impacts Analysis

Issues addressed in this memorandum include:

1. Structure of the Shoreline Master Program
2. Section by Section discussion of the Draft SMP

More detailed discussion of each of these issues is provided below.

1. Relationship of the Shoreline Master Program to the Comprehensive Plan and Development Regulations

This item was addressed in the October 23, 2008 Tech Memo Renton Shoreline Master Program, Regulatory Approach Options – Code Overview as item 1.

The Recommended Approach in that memo continues to be the consultant recommendation.

The long term proposal is to split the SMP into two sections:

- a) Comprehensive Plan Sections will include the following current SMP Sections:
 - i) Section 1 Introduction
 - ii) Section 3 Regulated Shorelines
 - iii) Section 4 Goals and Policies
- b) The Development Code will contain the following current SMP Sections:

- i) Section 2 Procedures - This section has already been codified as Section 4.9.190 of the Development Code and will be retained in that format throughout this review.
- ii) Section 5 Shoreline Geographic Environments – This section is still in the SMP format. It will be reformatted in the future to be part of Section 4.03.09 of the Development Code.
- iii) Section 6 General Use Regulations – This section is still in the SMP format. It will be reformatted in the future to be part of Section 4.03.09 of the Development Code.
- iv) Section 7 Specific Use Regulations – This section is still in the SMP format. It will be reformatted in the future to be part of Section 4.03.09 of the Development Code.
- v) Section 8 Shoreline Modification – This section is a new section. Some of the text has been relocated from previous Section 7. It will be reformatted in the future to be part of Section 4.03.09 of the Development Code.

The current draft retains the existing SMP sections in their current form except for two of the sections that have previously been codified and incorporated in the Development Code.

2. Overview of SMP Provisions

Section 1 Introduction

This Section is very similar to the existing SMA. It has been shortened and consolidated somewhat and some of the language has been revised to reflect the current Shoreline Management Guidelines, largely provisions of 173-26-176, General policy goals of the act and guidelines for shorelines of the state and 173-26-186 Governing principles of the guidelines.

Section 2 Procedures

This section has already been codified as RMC 4.9.190 and is included in that format below following the overview for sections retained in current format.

Section 3 Regulated Shorelines

This section has been slightly revised from the current SMP

It includes policies for Shorelines of Statewide Significance (SSWS)

This item was addressed in the October 23, 2008 Tech Memo Renton Shoreline Master Program, Regulatory Approach Options – Code Overview as item 2.

The Recommended Approach in that memo continues to be the consultant recommendation.

- (a) We have retained the recitation of policies for SSWS as found in RCW 90.58.020.
- (b) In Section 5 Shoreline Geographic Environments we recommend a separate overlay for High Intensity overlays on Lake Washington, the only SSWS and incorporate the additional criteria only for that area. We don't think the statutory requirements apply to the same extent to residential areas, and therefore have not proposed a separate residential overlay for Lake Washington.

Section 4 – Goals and Policies

This section is retained in the present SPM format but will be reformatted prior to adoption consistent with Comprehensive Plan sections.

These goals and policies generally reflect the required elements of the SMP in RCW 90.58.100.

About half the text is substantially revised or new. The major additions relate to

4.01 Shoreline Use and Activities Element

- Incorporates the residential policies in this heading
- Adds the specific provisions of the WAC 173-26-201(2)(d)(v), 241(3)(d) and related sections for “water dependent” and other uses

4.02 Conservation Element

- Incorporates the “no net loss” terminology from WAC 173-26-186 (8)(b)
- Incorporates provisions for Critical Areas from WAC 173-26-211(2)(b)(iii-v)
- References the Restoration Plan required by WAC 173-26-201(2)(f)

4.03 Economic Element

- Includes a conclusion that Renton need not reserve area for commercial ports because the necessary attributes are not present to specifically address the criteria in WAC 173-26-201(2)(d)(ii) as documented in the October 15, 2008 Technical Memo on Water Dependent Uses.

4.04 Public Access

This section includes in Table 4.04 the recommendation in the October 27 Technical Memo on Public Access which is to develop an integrated plan for a shoreline area public access system that identifies specific public needs and opportunities to provide public access as provided as an option in WAC 173-26-221(4)(c).

This approach identifies both private and public actions. A separate table in regulations currently labeled 6.06 would provide only the regulations.

4.07 Shoreline Historic, Cultural Scientific, Educational Resources and Activities

This new section is required by RCW 90.58.100 as an element of the program

4.08 Shoreline Restoration and Enhancement

This new section is required by WAC 173-26-186(8) and WAC 173-26-201 (2)(f)

Section 5 Shoreline Geographic Environment Designations

This item was addressed in the October 23, 2008 Tech Memo Renton Shoreline Master Program, Regulatory Approach Options – Code Overview as item 3.

The Recommended Approach in that memo continues to be the consultant recommendation.

Develop a new reach-based system that applies to properties that include both shoreline and upland areas or where broader city goals in the Comprehensive plan provide the primary guidance. This would continue the current administration of city zoning with an overlay that would provide an additional layer of review for the portions of a site near the shoreline.

We previously recommended for residential areas that a separate zoning classification for residential use be used for those properties that are entirely within shoreline jurisdiction or where shoreline values predominate over the entire parcel. The current draft, however, includes an overlay. We recommend additional discussion of this option.

5.02 Natural Environment Overlay

This is similar to the existing SMP with some additions mandated by WAC 173-26-211(5)(a).

Areas designated are the same as the existing SMP (Black River Forest) with the addition of the Natural Area on Lake Desire within unincorporated King County but within the UGA.

5.03 Urban Conservancy Overlay

This is similar to the existing conservancy designation with some additional mandated by WAC 173-26-211(5)(e).

Areas designated are the same as the existing SMP with the addition of the northern part of Gene Coulon Park currently designated urban.

5.04 Single-Family Residential Overlay

This is a new designation that follows the criteria in WAC 173-26-211(5)(f) that provides that “Local governments may establish two or more different "shoreline residential" environments to accommodate different shoreline densities or conditions...”

Areas designated are characterized by single family residential use.

Areas designated are the same as the existing SMP with the addition of the northern part of Gene Coulon Park currently designated urban.

5.05 Multi-Family Residential

This is a new designation that follows the criteria in WAC 173-26-211(5)(f) that provides that “Local governments may establish two or more different "shoreline residential" environments to accommodate different shoreline densities or conditions...”

A small area in the UGA on Lake Washington zoned multi family is proposed.

5.06 High Intensity – Lake Washington

This is a new designation that follows the criteria in WAC 173-26-211(5)(f) on Lake Washington. It replaces the previous “Urban” designation. A separate designation is proposed for Lake Washington because it is a Shoreline of Statewide Significance (SSWS). This difference is reflected in the standards for SSWS.

This would apply to all of Lake Washington except Conservancy and Residential designations.

5.07 High Intensity – Cedar River, Green River and Black River/Springbrook Creek

This is a new designation that follows the criteria in WAC 173-26-211(5)(f) on shorelines that are not Shorelines of Statewide Significance (SSWS). This difference is reflected in generally less specific standards for SSWS.

This would apply to all of these streams except the areas designated Natural, Conservancy, and Residential.

5.07 High Intensity – Isolated

This would apply to areas that are within shoreline jurisdiction but are effectively isolated from the water by intervening elements of the built environment, largely consisting of railroads and

roads or private parcels under separate ownership. WAC 173-26-241.(3)(d) provides an exception to the general prohibition of nonwater-oriented commercial uses in areas designated for commercial use if the site is physically separated from the shoreline by another property or public right of way.

We expect some questions from Ecology regarding this designation.

Section 6 General Development Standards

We have divided the previous “Section 6 – Use Regulations” into three separate sections

Section 6 General Development Standards – applies to all development

Section 7 Specific Use Regulations – applies to specific uses

Section 8 Shoreline Modification – this is in accordance with the new WAC 173-26

6.01 Applicability - clarifies that it applies to all use and development, not just shoreline permits

6.02 City-Wide Property Development Standards

Clarifies that standards for parking, landscaping, etc in the zoning code continues to apply, on a most stringent prevails basis

6.03 Use Preference

This is basically right out of the WAC 173-26 – see footnotes

6.04 Environmental Effects

6.04.01 No Net Loss – Adds requirements of WAC 173-26 – see footnotes

6.04.02 Burden on Applicant – Similar to existing SMP

6.04.03 Critical Areas

This item was addressed in the October 23, 2008 Tech Memo Renton Shoreline Master Program, Regulatory Approach Options – Code Overview as item 4.

The Recommended Approach in that memo continues to be the consultant recommendation.

a) Incorporate critical area regulations for “fish and wildlife conservation areas” in the SMP regulations as outline in (2) above.

b) Adopt by reference other Critical Area regulations in the Development Code.

These provisions are found in 8.01 Vegetation Conservation- which functions as the buffer requirements - and other Shoreline Modification standards in Section 8.

6.05 Use Compatibility and Aesthetics

This expands on categories previously under “View Obstruction, Community Disturbance, Design Theme, and Visually Unpleasant Areas”. In many cases it refers to other sections of the Development Code that apply on a most stringent prevails basis

6.06 Public Access

As mentioned above under Section 4.04 this approach follows the recommendation in the October 27 Technical Memo on Public Access which is to develop an integrated plan for a shoreline area public access system that identifies specific public needs and opportunities to provide public

access as provided as an option in WAC 173-26-221(4)(c). This approach identifies both private and public actions in Table 4.04 with Section 6.06 and Table 6.06 providing the regulations.

The provisions in 6.06.02.D.3 provide for a fund for off-site public access allowing charges to new development that do not meet all or part of their public access requirements is a “place holder” for now. Such a program could be developed in the future as an element of park impact fees without amendment of the SMP. In effect – this would involve a “fair share” contribution from projects not required to provide public access because of ecological sensitivity or other reasons. It would also provide an incentive to provide public access rather than pay the “in lieu” charge.

6.07 Facility Arrangement

This expands on a single paragraph in the existing SMP to integrate with other requirements of WAC 173-26.

6.08 Archaeological, Historic and Cultural Resources

This implements requirements of WAC 173-26-186(1) Archaeological and historic resources.

6.09 Standards for Density, Setbacks and Height

6.09.2.D Established development activities not subject to the dimensional requirements

Table 6.09 provides the basic bulk standards. The substance of the table is largely in the footnotes where reach-based standards are outlined.

There are several features of particular note:

Separate regulations are provided for the first 100 feet of shoreline – which is the standard “Vegetation Conservation” buffer and is the standard buffer in the previously adopted Critical Areas Regulations. The standards that apply within this area vary according to whether the entire area is anticipated as a buffer.

One critical element of how we structured provisions for the first 100 feet has been to avoid providing an incentive NOT to provide the buffer. If an applicant has the opportunity for a huge increase in floor area from less buffer area, the economic pressures to modify the buffers will be tremendous. This is reflected in provisions such as height where flexibility is allowed, but no additional floor area can result from that flexibility.

In general, the bulk regulations within the first 100 feet are somewhat lower than the next 100 feet, recognizing that less intense development on the shoreline is generally desirable. Standards for the second 100 feet are generally similar to zoning.

6.10 Private Property Rights

This is intended to meet the requirements of WAC 173-26-191(2)(a)(iii)(A).

“In addition to the requirements of the SMA, permit review, implementation, and enforcement procedures affecting private property must be conducted in a manner consistent with all relevant constitutional and other legal limitations on the regulation of private property. Administrative procedures should include provisions insuring that these requirements and limitations are considered and followed in all such decisions.”

Such provision necessarily would have to be implemented on a case-by-case basis.

Section 7 Specific Use Regulations

7.01 Aquaculture – this isn't expected to occur, but it is a preferred use in accordance with the statute and some regulations are needed.

7.02 Boat Launching Ramps

This incorporates an update of regulations currently applied to this preferred use.

7.03 Commercial Development

This section closely follows the WAC 173-26-241(3)(d) that prefers water-dependent and water-oriented use. It also distinguishes between Lake Washington as a Shoreline of Statewide Significance. A specific provision notes that water-dependent uses such as port uses are not likely to be accommodated in Renton that are addressed in the Technical Memo on that issue.

This item was addressed in the October 23, 2008 Tech Memo Renton Shoreline Master Program, Regulatory Approach Options – Specific Issues as item 1. The bottom line is we don't have much choice in these provisions, except for details or wording.

7.04 Industrial Development

Not much additional industrial development is expected and most that exists is protected as a “non-conforming use”. The section is short and reflects WAC 173-26-241(3)(f).

7.05 Marinas

This section largely updates criteria in the code in a dated form and adds no net loss and other criteria in the new guidelines

Marinas are addressed in WAC 173-26-241(3)(c) for “boating facilities” that apply to docks serving more than 4 single family lots.

7.06 Mining – continues to be prohibited in the shoreline

7.07 Piers and Docks

This has been updated to include the requirements in 173-26-231(3)(b) and applies to single-family, shared docks and commercial docks. The provisions of WAC 173-26-241(3)(c) for “boating facilities” apply to docks serving more than 4 single family lots, as well as docks serving multi-family development.

Only single family docks are allowed as an “accessory use” according to statute. All other docks have to earn their way as water dependent, or providing public access.

It also incorporates many of the Corps of Engineers provisions for docks on Lake Washington with added flexibility allowed.

7.08 Recreation

This largely adds requirements in WAC 173-26-241(3)(i). We depart a little from the WAC in addressing private recreation here instead under the commercial heading. This largely adds “no net loss” and other features of the new guidelines.

7.09 Residential

This largely adds requirements in WAC 173-26-241(3)(j). This largely adds “no net loss” and other features of the new guidelines.

7.10 Transpiration

This section combines several sections previously separate, including aviation, trails and parking.

7.10.01 and .02 Roads and Railroads include relatively minor changes.

7.10.03 Trails also incorporates relatively minor changes.

7.10.04 Parking – largely adds provisions for structured parking not in the existing SMP.

7.10.5 Aviation

- a) Adds flexibility to expansion of (the) existing airport(s).
- b) Deletes reference to a “seaplane base” which is the FAA regulated area where planes land.
- c) Adds heliports as a conditional use based on Ecology input.

7.11 Utilities

This section keeps the basic structure of the present SMP but adds particulars.

Section 8 Shoreline Modification

This new section is added to respond to WAC 173-26-231 (1) that encourages “master program provisions that distinguish between shoreline modifications and shoreline uses”.

8.01 Vegetation Conservation

In many ways this is a key section of the new SMP. It provides:

- Buffer functions for the Critical Area “Fish and wildlife habitat conservation areas” pertaining to shorelines.
- It is an important element of the strategy for Mitigation of Cumulative Impacts

This item was addressed in the October 23, 2008 Tech Memo Renton Shoreline Master Program, Regulatory Approach Options – Specific Issues as items 2 and 2. We have incorporated in the proposed SMP two of the options

- b. Strengthen the criteria and standards in the existing code on a general basis to provide for a level of enhancement that clearly improves ecological function, and*
- c. Develop specific regulations based on the specific reaches*

Also relevant is the October 23, 2008 Tech Memo - Code Overview as item 5 dealing with cumulative impacts and relates to:

WAC 173-26-186 Governing principles of the guideline provides a mandate in (8)(d) to evaluate and consider cumulative impacts of reasonably foreseeable future development on shoreline ecological functions and other shoreline functions fostered by the policy goals of the act. To ensure no net loss of ecological functions and protection of other shoreline functions and/or uses, master programs shall contain policies, programs, and regulations that

- address adverse cumulative impacts and*

- *fairly allocate the burden of addressing cumulative impacts among development opportunities.*

However, the program includes several provisions that reduce the requirement for specific cases:

- Section 8.01.D provides a sliding scale for single family lots based on lot depth. We think this is a necessary and realistic approach that recognizes that there are properties where the standard buffer cannot be accommodated. The proposed buffers and setbacks seek to strike a balance between buffers and developable areas.
- Table 8.01 provides reach based provisions that also include recognition that the priority in some areas is for public access or water-oriented development.

The program in 8.01.02.K provides the opportunity to partially implement option (b) through providing for assessment of new development that preserves less than the standard buffer and providing a fund from which the city would make off-site improvements. This program requirement is a “place holder” for now. In order to function, such a program would require a separate enabling ordinance that would establish the formula for payment. This provision would respond to the mandate in WAC 173-26-186 to “fairly allocate the burden of addressing cumulative impacts among development opportunities”.

8.01.02.I.5 also include for existing single family development a provision that limits view obstruction by large trees to a maximum of 30% of existing water views.

Provisions in the code for variation of requirements other than through the single family sliding scale or the table are adapted from the Critical Areas regulations, but are somewhat more stringent, recognizing the special status of shorelines.

8.02 Landfill and Excavation

This largely adds requirements in WAC 173-26-231(3)(f) including “no net loss” and other features of the new guidelines.

8.03 Dredging

This largely adds requirements in WAC 173-26-231(3)(c) including “no net loss” and other features of the new guidelines.

A specific feature reflecting the findings of the Inventory/Characterization is a specific limit on dredging the delta of the Cedar River and May Creek. These were dredged in the past for flood control, and in the case of Barbee Mill for log storage. The City Surface Water Division has confirmed that dredging is not needed for flood control (although dredging for this purpose is proposed to be allowed). In addition, as part of the Barbee Mill subdivision approval, the city required modeling of May Creek assuming re-establishment of the delta and assured that the corridor provided for May Creek and design of bridges would accommodate the 1% flood event.

In the future, the formation of the delta will interfere with a few docks in the area. Such an impact must be balanced with the clear ecological benefits of allowing this natural process to re-establish. It will take a decade or so for the delta to re-establish in the area previously dredge. There is one existing permit for dredging in the May Creek delta, however it is for an area of only 10,000 square feet for a limited time period and some distance from the mouth of the stream. The existing permit will allow dredging and use of the moorage facility over the short to medium term and will expire by the time the natural delta formation process is likely to reach the area.

8.04 Shoreline Stabilization

This largely adds requirements in WAC 173-26-231(3)(a). This section of the Shoreline Management Guidelines is one of the most specific sections. It is quite consciously designed to completely change the way shoreline bulkheads have been developed in the past.

This was discussed extensively in the November 5 Technical Memo - Opportunities and Constraints for Maintaining and Enhancing Ecological Productivity. This memo discussed the likely adverse effects of bulkheads, the conclusions of the National Marine Fisheries Service that they are a contributor to the decline in salmon in the lake and their preferred methods of providing shoreline protection.

The provisions in the proposed SMP are designed to largely reflect the criteria in WAC 173-26-231(3)(a) and will accommodate designs preferred by NMFS and are flexible enough to accommodate changes in scientific knowledge and development of new models for ecologically sound shoreline protection.

Another important element of shoreline protection features is addressing them as non-conforming features, which is discussed below under Section 4-10-095.

This is also an important element of the provision of Critical Areas regulations for Critical Area "Fish and wildlife habitat conservation areas" pertaining to shorelines.

8.05 Flood Control Works

This largely adds requirements in WAC 173-26-221(3). The proposal has been reviewed by the City Surface Water Division.

8.06 Stream Alteration

This section has been revised to respond to general requirements of WAC 173-26 and is fairly similar to the existing SMP.

This is also an important element of the provision of Critical Areas regulations for Critical Area "Fish and wildlife habitat conservation areas" pertaining to shorelines.

Section 4-9-197 Shoreline Permits

This is one of the sections of the SMP that has already been codified as part of the Development Code.

4-9-197.B. Applicability

This section has been modified to provide additional specific direction and also responds to WAC 173-26-176(2)(a)(iii)(A)

Statement of applicability. The Shoreline Management Act's provisions are intended to provide for the management of all development and uses within its jurisdiction, whether or not a shoreline permit is required. Many activities that may not require a substantial development permit, such as clearing vegetation or construction of a residential bulkhead, can, individually or cumulatively, adversely impact adjacent properties and natural resources, including those held in public trust. Local governments have the authority and responsibility to enforce master program regulations on all uses and development in the shoreline area. There has been, historically, some public confusion regarding the Shoreline Management Act's applicability in this regard. Therefore, all master programs shall include the following statement:

"All proposed uses and development occurring within shoreline jurisdiction must conform to chapter 90.58 RCW, the Shoreline Management Act, and this master program."

Other provisions are intended to provide specific direction in administration.

Other provisions B-P have been modified only slightly.

4-9-197.Q. Shoreline Moratorium

This adapts an amendment to the statute adopted in the last legislative session.

New Section 9-10-095 Non-Conforming Uses, Activities and Structures.

This was discussed extensively in the November 5 Technical Memo – Code Overview as topic 6. . Provisions for existing development

Also relevant is the October 23, 2008 Tech Memo - Code Overview as item 5 dealing with cumulative impacts and relates to the findings of the Inventory/Characterization that existing bulkheads, docks, and vegetation management contribute to ecological decline reflected most significantly in declines in salmon populations, specifically nearshore rearing of Cedar River Chinook populations and the precipitous decline in sockeye beach spawning. We also know that pesticides commonly used in lawn maintenance can have an adverse impact on aquatic species This was discussed in the November 5 Technical Memo – Code Overview as topic 6 Provisions for existing development

The proposed SMP revisions are consistent with the recommendation to add provisions to the alternation and expansion section specific to shoreline properties (and perhaps with separate provisions for single family development that would address ongoing impacts to shoreline functions and require changes on a sliding scale addressing such features as:

- Meeting standards for shoreline vegetation to avoid application of fertilizers and herbicides close to the water
- Meeting standards for shoreline vegetation to provide habitat functions such as shading and foodchain functions
- Meet current standards for bulkheads
- Meet current standards for docks

The proposed code includes the following features

Section 4-10-095.C Nonconforming site. This adds recognition that site conditions, such as bulkheads, docks, and vegetation management may be non-conforming as to requirements of the SMP, in addition to uses and structures.

Section 4-10-095.C Partial Compliance, Alteration of Nonconforming Structure or Site

This provision replaces the approach in the general code standards in RMC 4-10-050 for nonconforming structures and RMC 4-10-060 for nonconforming uses. The current code provisions restrict alterations to 50% of the value of the structure and requires full conformance at alteration above that amount.

The proposal has three steps that add requirements in the lower steps with full compliance, as in the Development Regulations, at 50% increased in value

1. Minor alteration or renovation is

- a. Expansion of floor area by up to 500 square feet, or by up to 10 percent, whichever is less;
- b. Expansion of impervious surface by up to 1,000 square feet, or by up to 10 percent, whichever is less;
- c. Remodeling or renovation that equals less than 30 percent of the value of the existing structures or improvements,

Partial compliance at this stage includes vegetation management consisting of revegetation to an native vegetation community of at least 50 percent of the area between an existing building and the water's edge or at least 15 feet and removal of any over-water structures that do not serve a permitted water dependent or public access use. This would not affect existing single family docks.

2. Moderate alteration or renovation is

- a. Expansion of floor area by 500 square feet or more, or between 10 and 25 percent,
- b. Expansion of impervious surface by more than 1,000 square feet, or between 10 and 25 percent, whichever is less; provided that said expansion shall not extend either further waterward than the existing structure, and shall comply with all other dimensional standards, or
- c. Remodeling or renovation between 30 and 50 percent of value

Partial compliance at this stage includes vegetation management consisting of revegetation of 80 percent of the area between an existing building and the water's edge or at least 15 feet, meeting dimensional standards for over-water structures, or removal of over-water structures that do not serve a permitted water dependent or public access use. This would affect single family docks and require replacement of existing bulkheads with those that conform to current standards.

3 Full Compliance is required at

- a. Expansion of floor area by 25 percent or more, or the expansion of impervious surface by 25 percent or more; or
- b. Remodeling or renovation equal to or exceeding 50 percent of the value of the existing structures or improvements, excluding plumbing and mechanical systems.

These provisions would not allow the 100 percent increase in value allowed as a special case in RMC 4-10-050.

We believe these provisions are critical to meeting cumulative impact of no net loss. It appears that current patterns of bulkheads, docks, and other features are contributing to a continued decline in aquatic habitat quality most noticeable in declines in Chinook salmon and Sockeye. We know that the nearshore is critical to a key lifecycle stage for Cedar River Chinook and for beach spawning sockeye. We also know that pesticides commonly used in lawn maintenance can have an adverse impact on aquatic species. In addition, voluntary actions such as the "green shorelines" will be very important, because in the short term, many properties will not undergo any change that triggers these requirements.

Chapter 4-11 Definitions

The additional definitions are largely added in WAC 173-26.